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Procter & Gamble

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August 29, 2000

Via Facsimile 312-886-6064 and Certified Mail

G. Marie Watts (SR-6J)
U.S. Environmental Protection Agency
77 W. Jackson Blvd.
Chicago, Illinois 60604

Re: Special Notice of Liability, Sauget Area 2 Site, Sauget/Cahokia, Illinois

Dear Ms. Watts:

This replies to the Special Notice of Liability letter dated June 23, 2000 addressed to "Procter & Gamble Pharmaceutical, 11450 Grooms Road, Cincinnati, Ohio 45242-1408." This letter was postmarked August 11, 2000, received at the Grooms Road building on August 15, and subsequently forwarded to me for response.

The Special Notice Letter requests that we notify the US EPA of our willingness to participate in negotiations to perform or finance the remedial investigation of the Sauget Area 2 Site. At this time we are unable to respond to this request because we cannot evaluate the EPA's assertion that "Procter & Gamble Pharmaceutical" is a PRP, in the absence of any nexus data.

As background, Procter & Gamble Pharmaceuticals, Inc. was incorporated in 1987; however, from 1987 until 1992 the corporation was known as Norwich Eaton Pharmaceuticals Inc. The name of Norwich Eaton Pharmaceuticals Inc. was changed in 1992 to Procter & Gamble Pharmaceuticals, Inc. Prior to 1987 the assets of Norwich Eaton Pharmaceuticals, Inc. were owned by another corporation with the Norwich name. Further, the building at 11450 Grooms Road was not leased by Norwich Eaton Pharmaceuticals Inc. until December 1991. That corporation had no connection with this building prior to that date. Given this history of the existence of the Procter & Gamble Pharmaceuticals name and the lease of this building, it is difficult to understand how there could be a connection with the Sauget Area 2 Site, which appears to have been in use during a period many years prior to 1991/1992.

Earlier this month we received a letter regarding the initial meeting on this Site scheduled by the USEPA for August 2, 2000. We received this letter after the meeting had taken place. Upon receiving this letter I telephoned Mr. Martin to ask for the nexus materials in the Agency's possession which allegedly connects Procter & Gamble Pharmaceuticals to this Site. Mr. Martin informed me that there are witness interviews, as I understand it in connection with a cost recovery action in another case, but that these cannot be released at this point because they are considered enforcement confidential. If I have mis-stated this, please let me know. It would

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seem that there should be some way for this information to be provided to alleged PRPs in the Sauget Site, perhaps by getting the consent of the party involved in the enforcement case or by providing redacted information from these documents. This requests that the Agency reconsider its position on release of these interviews at this time, so that Procter & Gamble Pharmaceuticals, Inc. and other alleged PRPs can evaluate their potential liability for this Site.

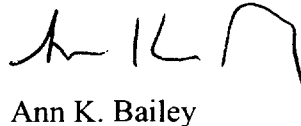
All future correspondence regarding this Site should be sent to:

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Thank you for your assistance.

Very truly yours,

A handwritten signature in black ink, appearing to be 'AKB' with a stylized flourish at the end.

Ann K. Bailey

cc: Mike McAteer—Fax 312-886-4071
Thomas J. Martin—Fax 312-886-0747